

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Waiver of Rules Requiring Support)	GN Docket No. 15-178
of TTY Technology)	
)	

REPORT

On December 29, 2017, the Federal Communications Commission (“FCC” or “Commission”) granted TracFone Wireless, Inc. (“TracFone”) an extended waiver of its requirements to support text telephony (“TTY”) over Internet-Protocol (“IP”)-based wireless services until June 30, 2021.¹ As a condition of the grant, TracFone is required to file a report with the Commission every six months describing its progress toward implementing real-time text (“RTT”).² Specifically, the Commission has asked that TracFone “indicate the extent to which RTT solutions are available from its underlying carriers, in addition to providing information on its own progress toward implementing RTT solutions.”³ TracFone’s first progress report is below.

TracFone supports the Commission’s goal of providing RTT solutions that can be used by individuals who are deaf, hard of hearing, deaf-blind, and have a speech disability.⁴ As the

¹ *TracFone Wireless, Inc., Petition for Extension of Waiver of Rules Requiring Support of TTY Technology*, Order, 32 FCC Rcd 10470 (2017) (“*TracFone Waiver Order*”).

² *TracFone Waiver Order*, ¶ 9.

³ *TracFone Waiver Order*, ¶ 9 n. 31.

⁴ *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, ¶ 8 (2016) (“*RTT Report and Order*”).

Commission has noted, however, TracFone is a mobile virtual network operator (“MVNO”) that resells “commercial mobile radio service (CMRS) obtained through agreement[s] with various licensed operators of wireless networks throughout the United States.”⁵ MVNOs are in the unique position of being entirely dependent on the solutions implemented by their underlying facilities-based carriers.

The Commission requires that, when implemented, RTT solutions must be interoperable, backward compatible with TTY technology, and capable of supporting certain basic features and capabilities available to users.⁶ After consulting with our underlying carriers, we are able to report that they continue to make progress in implementing industry standard RTT solutions to meet the Commission’s requirements.⁷ Overall, TracFone’s underlying carriers are implementing both app-based and device-based RTT functionalities. One carrier reports it has fully implemented its RTT solutions, while others are still testing both their app and device-based functionalities.

To ensure subscribers’ communications are transmitted across various carriers and devices, our underlying carriers are conducting cooperative interoperability testing between their networks. Our underlying carriers report that their testing has shown progress and has not encountered any major challenges.

In addition, our underlying carriers continue to accommodate consumers who rely on the TTY method during the transition to RTT technology, and they report that there have been no obstacles to achieving the required backward compatibility.

⁵ *TracFone Waiver Order*, ¶ 4.

⁶ *See RTT Report and Order*, ¶ 26.

⁷ AT&T Services, Inc., Verizon, and T-Mobile USA, Inc., which are the underlying carriers serving 99% of TracFone’s customers, provided the information presented in this report.

Finally, recognizing the imperative that RTT solutions be able to transmit emergency information to the correct public safety answering points (“PSAP”), our underlying carriers are working to ensure that their solutions allow our subscribers to connect to the appropriate PSAP. While some carriers continue testing RTT to PSAPs, the carriers have not identified any issues with routing 911 calls.

Although the Commission granted TracFone an extended waiver until June 30, 2021 of the Commission’s requirements to support TTY technology over IP-based wireless services, TracFone will endeavor to implement its underlying carriers’ app and device-based RTT solutions as they become available to TracFone. In the interim, if a customer’s device does not support RTT, TracFone will also endeavor accommodate his or her request for RTT functionality by switching that customer’s device and underlying carrier to one that enables an RTT solution.

TracFone will continue to monitor the progress being made by its underlying carriers in their various stages of testing.

Respectfully submitted,

TRACFONE WIRELESS, INC.

By: /s/ Stephen Athanson

Stephen Athanson
Senior Attorney – Regulatory
TracFone Wireless, Inc.
9700 NW 112th Avenue
Miami, FL 33178

June 29, 2018